

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

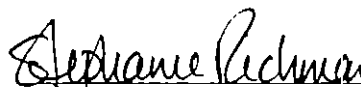
DOCKET NO. R97-1

**SECOND SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS O'HARA  
(UPS/USPS-T30-3 through 4)**

(July 25, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness O'Hara (UPS/USPS-T30-3 through 4).

Respectfully submitted,



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Of Counsel.

**INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS O'HARA**

**UPS/USPS-T30-3.** Please refer to lines 22-25 on page 3 of your testimony. List all instances in which one of the Act's pricing criteria indicates a conflicting direction from that indicated by another of the Act's pricing criteria.

**UPS/USPS-T30-4.** Please refer to lines 35-36 on page 5 and lines 1-4 on page 6 of your testimony. In arriving at your proposed rate levels, did you increase or decrease a subclass's proposed cost coverage from what you otherwise would have proposed when that subclass's share of volume-variable cost is higher under the new cost methods?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in  
accordance with section 12 of the Commission's Rules of Practice.

  
Stephanie Richman

Dated: July 25, 1997  
Philadelphia, Pa.